

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

STATE OF GEORGIA,

DEFENDANT.

Civil Action No.

1:16-cv-03088-ELR

NOTICE OF DEPOSITION PURSUANT TO RULE 30(b)(6)
OF CSB OF MIDDLE GEORGIA

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the undersigned counsel, on behalf of the United States of America will take the deposition upon oral examination of CSB of Middle Georgia (the "Organization"), on November 29, 2022, beginning at 9:00 a.m. at CSB of Middle Georgia, 2121-A Bellevue Road, Dublin, Georgia 31021, by a person or persons knowledgeable about information reasonably available to the Organization concerning the subject matters listed on the attached Exhibit A.

The deposition will be taken before an officer authorized to administer oaths and recorded by stenographic and audiovisual means. The deposition will continue from day-to-day until adjourned. It will be taken for the purpose of discovery and any other purpose permitted by the Federal Rules of Civil

Procedure. You are invited to attend and cross examine. Counsel may attend by Zoom.

Dated: November 7, 2022.

Respectfully submitted,

RYAN K. BUCHANAN
United States Attorney

/s/ Aileen Bell Hughes

AILEEN BELL HUGHES
Assistant United States Attorney
Georgia Bar No. 375505
Aileen.bell.hughes@usdoj.gov
600 U.S. Courthouse
75 Ted Turner Drive SW
Atlanta, GA 30303
(404) 581-6000 Fax (404) 581-6181

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

STATE OF GEORGIA,

DEFENDANT.

Civil Action No.

1:16-cv-03088-ELR

Certificate of Compliance

I hereby certify, pursuant to Local Rules 5.1 and 7.1D, that the foregoing notice has been prepared using Book Antiqua, 13-point font.

/s/ Aileen Bell Hughes

AILEEN BELL HUGHES

Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

STATE OF GEORGIA,

DEFENDANT.

Civil Action No.

1:16-CV-03088-ELR

Certificate of Service

I served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

November 7, 2022

/s/ Aileen Bell Hughes

Aileen Bell Hughes

Assistant United States Attorney

ATTACHMENT A

Pursuant to Fed. R. Civ. P. 30(b)(1),(6) and 45(a)(1)(A)(iii), the Community Service Board of Middle Georgia (the “Organization”) is commanded to designate one or more officers, director, managing agents, or other persons who consent to testify on behalf of the Organization about subject matters listed below. Unless otherwise specified, these matters relate to the time period from January 1, 2019 through the present.

DEFINITIONS

As used in this subpoena, the words and phrases listed below shall have the following meanings:

1. For purposes of responding to this subpoena, “you” means the Organization, its constituent agencies or facilities, and any of its officers, employees, contractors, attorneys, representatives, investigators, agents, or any other person acting or purporting to act on its behalf.
2. “Behavioral Health Coordinating Council” means the entity identified as such here: <https://gacoeonline.gsu.edu/soc/behavioral-health-coordinating-council/>.
3. “Behavioral health service” means any service listed by DBHDD in its Community Behavioral Health Provider Manual for the relevant Fiscal Year as a “child and adolescent non-intensive outpatient service” or “child and adolescent specialty service,” excluding services relating to or provided in connection with the Apex Program.
4. “Care Management Organization” (“CMO”) means any entity organized for the purpose of providing or arranging health care as defined under Ga. Code Ann. § 33-21A-2(1), including Amerigroup Community Care, Care Source, Peach State Health Plan, and WellCare of Georgia, Inc.
5. “Child” or “children” mean youth between the ages of 5 and 21.
6. “Community Service Board, or CSB,” means any of the organizations so identified by the DBHDD here: <https://dbhdd.georgia.gov/locations/community-service-board>.
7. “Document” means writings, electronic mail, drawings, graphs, charts, photographs, sound recordings, images, and other data, data records, or data compilations stored in any medium from which information can be obtained.

8. “Fiscal Agent” means the local educational agency (“LEA”) or the regional education service agency (“RESA”), as set forth in Ga. Code Ann. § 20-2-270.1.

9. The Georgia Apex Program, or Apex, means the program identified as such by the Georgia Department of Behavioral Health and Developmental Disabilities (DBHDD) here: <https://dbhdd.georgia.gov/georgia-apex-program>.

10. “GNETS Program” or “GNETS” means the Georgia Network for Educational and Therapeutic Support Program and any of the twenty-four regional GNETS programs—which may include GNETS Centers, GNETS Classrooms, and/or other settings where GNETS services are provided—including all officers, employees, contractors, attorneys, representatives, investigators, agents, or any other person acting or purporting to act on its or their behalf.

11. “Interagency Directors Team” means the entity identified as such here: <https://gacoeonline.gsu.edu/soc/idt/>.

12. “Local Interagency Planning Teams” mean the entities identified as such here: <https://gacoeonline.gsu.edu/soc/lipt/>.

13. “Policies” or “procedures” means any written or unwritten policy, procedure, manual, guidance, protocol, directive, mandate, rule, regulation, course of action, strategy, plan, guiding principle, guidelines, method, routine, process, modus operandi, technique, practice, system, formula, routine, or other mode of conduct that governs operations.

14. The present tense includes the past and future tenses. Words in the singular and plural are interchangeable. The terms “all” and “any” mean “any and all;” “and” and “or” encompass both “and” and “or.” The word “including” means “including, but not limited to.”

TOPICS

1. The operations, organizational structure, purpose, and administration of the Organization in connection with the provision of behavioral health services for children, including information relating to staffing, programs, and funding for services within its catchment area.
2. Strategic planning in connection with the provision of behavioral health services for children, including any processes for tracking and reporting on progress.

3. Grants sought or obtained by the Organization or its affiliates, including any reporting in connection with those grants, to support the provision of behavioral health services for children or other school-based services and supports for children.
4. Contracts, partnerships, or other coordination between the Organization and any of the following entities:
 - a. The Georgia Department of Behavioral Health and Developmental Disabilities;
 - b. The Georgia Department of Community Health;
 - c. The Georgia Department of Education;
 - d. The Georgia State University Center of Excellence;
 - e. Fiscal Agents;
 - f. GNETS programs;
 - g. Other Community Service Boards, including through the Georgia Association of Community Service Boards and its officers;
 - h. Other providers of behavioral health services for children in Georgia; and
 - i. The Georgia Advocacy Office.
5. Behavioral health services for children offered by the Organization in schools, homes, offices, or other community-based settings, including:
 - a. Staffing for the Organization's behavioral health services for children, including any relevant licensing or training requirements;
 - b. the Organization's assessments or screening protocols/forms/template documents, whether formal or informal, relating to children's social/behavioral/emotional functioning, including trends in utilization of any such assessments or screening protocols/form/template documents during the relevant period;
 - c. Training on evidence-based practices or promising practices relating to behavioral health services for children offered by the Organization;

- d. Trends in utilization of the Organization's behavioral health services for children during the relevant period;
 - e. Trends in funding for the Organization's behavioral health services for children during the relevant period, including funding sought or obtained through DCH's Medicaid program, Care Management Organizations, or DBHDD's fee-for-service program;
 - f. Provision by the Organization of behavioral health services to children enrolled in a regional GNETS program and their families, and coordination or communication between the Organization and any GNETS employee relating to such services;
 - g. Gaps in available behavioral health services for children; and
 - h. Barriers to accessing behavioral health services for children.
6. the Organization's participation in the Apex program, including contracting, strategic planning, progress reporting, staffing, funding, scope of services, service utilization, and any coordination with other CSBs, DBHDD, DCH, GaDOE, Fiscal Agents, regional GNETS programs, and school districts.
7. The Organization's efforts to implement, or participation in, a System of Care framework, including relevant programs or initiatives, contracting, strategic planning, progress reporting, staffing, funding, and any coordination with other CSBs, DBHDD, DCH, GaDOE, Fiscal Agents, GNETS programs, the Interagency Directors Team, Local Interagency Planning Teams, and the Behavioral Health Coordinating Council.
8. The Organization's protocols or tools for monitoring social/behavioral/emotional functioning and progress (including relating to discipline) – e.g., the Child and Adolescent Needs and Strengths ("CANS") tool – and related written policies, aggregate data, or progress reporting.